

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Jamiee L. DeSimone	Debtor(s)	20-20487 GLT Chapter 13 Proceeding Hearing Date: 05/19/2021 at 10:00 am
Freedom Mortgage Corporation	Movant	
v. Jamiee L. DeSimone and Ronda J. Winnecur, Esquire	Respondents	

**CERTIFICATE OF NO RESPONSE  
TO MOTION TO APPROVE MORTGAGE FORBEARANCE**

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading to the Motion filed on 04/20/2021 has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Hearing, objections to the Motion were to be filed and served no later than **05/07/2021**.

It is hereby respectfully requested that the Order attached to the Motion be entered by the Court.

Respectfully submitted,  
POWERS KIRN, LLC

By: /s/ Jill Manuel-Coughlin  
By: Jill Manuel-Coughlin  
Attorney ID # 63252  
Eight Neshaminy Interplex, Suite 215  
Trevose, PA 19053  
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Attorney for Movant  
DATED: May 12, 2021

21-0015

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	Chapter 13 Proceeding
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	Debtor(s) Movant Respondents

**CERTIFICATION OF SERVICE AND NOTICE**

JILL MANUEL-COUGHLIN, counsel for Freedom Mortgage Corporation, hereby certifies that a copy of the foregoing Certificate of No Response was served upon the following persons by electronic notification or regular first-class mail, postage prepaid, on May 12, 2021:

**Served Electronically:**

Christian M. Rieger, Esquire  
2403 Sidney Street, Suite 250B  
Pittsburgh, PA 15203  
Attorney for Debtor(s)

Ronda J. Winneccour, Esquire  
600 Grant Street, Suite 3250  
Pittsburgh PA 15219  
Trustee

**Served Via 1st Class Mail:**

Jamiee L. DeSimone  
371 Greene Drive  
Clairton PA 15025  
Debtor

Justin F. DeSimone  
371 Greene Drive  
Clairton, PA 15025  
Co-Debtor

POWERS KIRN, LLC

By: /s/ Jill Manuel-Coughlin

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Attorney ID # 63252  
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